

Exhibit F

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND

JOSHUA MELLO
and RACHEL WARE

Plaintiff,

vs.

JOHN ROCCHIO and EDWARD ARRUDA

Defendants

C.A. No. 1:23-cv-000479-JJM-LDA; 1:23-
cv-000480-JJM-LDA

**DEFENDANTS' THIRD REQUEST FOR
PRODUCTION OF DOCUMENTS ADDRESSED TO PLAINTIFF, JOSHUA MELLO**

Now come Defendants, Edward Arruda and John Rocchio in the above matter and request that the Plaintiff, Joshua Mello, produce for inspection and/or copying the original or a true copy of the following documents to DeSisto Law, 60 Ship Street, Providence, RI, 02903, within thirty (30) days, pursuant to Rules 26 and 34 of the Federal Court Rules of Civil Procedure.

I. DEFINITIONS

The following definitions shall apply to the Request for Production:

A. "Document" shall have the meaning ascribed to it in Rule 34(a) of the Federal Rules of Civil Procedure and shall also mean any paper or other writing and any items of graphic material, however recorded or reproduced, including all drafts, copies or other preliminary material which are different in any way from the executed or final documents, regardless of whether designed "confidential," "privileged" or otherwise restricted, wherever located, whether an original or a copy, including but not limited to agreements, contracts, financial statements, invoices, minutes, work sheets, work papers, summaries and other written records, recordings or notes of any conferences, meetings, visits, examinations, consultations, interviews or telephone

Mello, et al, v. Derek Gustafson, et al

C.A. No. 1:23-cv-000479-JJM-LDA

C.A. No. 23-cv-000480-JJM-LDA

conversations, financial and statistical data, analyses, surveys, transcripts of testimony, statements, interviews, affidavits, press releases, memoranda, drafts, memo pads, notes, indices, tabulations, graphs, reports, papers, records, interoffice communication, electronic data processing cards, audiotapes, videotapes, other audio or video recordings, computer-generated tapes or recordings, print-outs, papers or other recordings, tables, compilations, catalogues, telegrams, letters, photographs, diaries, calendars, drawings, data-reports, printed matter, correspondence, electronic, computer-generated or other communications received or sent, books, brochures, advertisements, circulars, mailing and publications; and any copy containing thereon or having attached thereto any alterations, notes, comments, or other material shall be deemed a separate document from the original or any other copy not containing such materials within the foregoing definition.

B. “You” and “your” means the Plaintiff that is answering these Requests, that Plaintiff’s agents, servants, attorneys and/or any and all other persons acting, or purporting to act, on that Plaintiff’s behalf or under the Plaintiff’s direction or control.

C. “Person” means the plural as well as the singular and includes any natural person, and any firm, association, partnership, joint venture, business trust, corporation, governmental or public entity, department, agency, office, or any other form of legal entity.

D. The words used in this document have been selected for their common meanings, and no particular magic of punctuation or sentence construction is intended. Please resolved any doubt about the meaning or intent of any phrase or combination of phrases by arriving at an interpretation that permits the request to address a relevant, even productive, area of inquiry. If you cannot resolve any such doubt, you are invited to call the author to resolve any ambiguities

Mello, et al, v. Derek Gustafson, et al
C.A. No. 1:23-cv-000479-JJM-LDA
C.A. No. 23-cv-000480-JJM-LDA

through discussion rather than simply state an objection for vagueness and wait for judicial resolution of the discovery objection.

I. PRIVILEGE

If any document is withheld on the grounds that the document is subject to a claim of privilege, confidentiality or for any other reason:

- (a) state the reason for withholding the document;
- (b) identify the person(s) who have knowledge about the information being withheld; and
- (c) Identify by document the author, date, subject matter and identify each person who received a copy of the document. Identification will not be considered as a waiver of your claim of privilege or confidentiality.

II. DOCUMENT REQUESTS

1. Any and all state and federal tax returns filed in relation to your business “K’s Kustoms” for 2017, 2018, 2019, 2020, 2021, 2022, and 2023.
2. Any and all lists, spreadsheets, or other documents related to your business, “K’s Kustoms” that show, depict, analyze, and/or state your profits and losses for the business from 2017, 2018, 2019, 2020, 2021, 2022, and 2023.

Defendants
By their Attorney,

/s/ Julia K. Scott- Benevides
Julia K. Scott- Benevides (#10408)
DeSisto Law LLC
60 Ship Street
Providence, RI 02903
(401) 272-4442
julia@desistolaw.com

Mello, et al, v. Derek Gustafson, et al
C.A. No. 1:23-cv-000479-JJM-LDA
C.A. No. 23-cv-000480-JJM-LDA

CERTIFICATION

I certify that a true and accurate copy of the within was emailed and mailed, postage prepaid, to on the 26th day of October 2024:

Joshua Mello
57 Rolfe Square, Unit 10113
Cranston, RI 02910
kskustomsrideons@gmail.com

Rachel Ware
57 Rolfe Square, Unit 10113
Cranston, RI 02910
kskustomsrideons@gmail.com

/s/ Julia K. Scott- Benevides